



# **COUNTY OF PLACER FACILITY SERVICES DEPARTMENT**

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August 9, 2010

Central Valley Regional Water Quality Control Board  
NPDES - Sacramento Watershed Unit  
Attn: Diana C. Messina  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

**RE: COMMENTS REGARDING CONTINUED TENTATIVE ORDER FOR PLACER COUNTY  
SEWER MAINTENANCE DISTRICT 1 WASTEWATER TREATMENT PLANT**

Dear Ms. Messina:

Placer County hereby submits the enclosed comments regarding the July 2010 Tentative Waste Discharge Requirements for Placer County Sewer Maintenance District 1 (SMD 1) Wastewater Treatment Plant (Continued Tentative Order). The Continued Tentative Order will be considered for adoption at the September 2010 Central Valley Regional Water Quality Control Board (Regional Water Board) meeting. Our comments address the Continued Tentative Order and Alternatives 1, 2, and 3 contained therein.

The County has the following objections to the Continued Tentative Order and its Alternatives:

- Inclusion of effluent limitations for aluminum and arsenic
- The need for in-permit compliance schedules for BOD, TSS, total coliform organisms, Title 22 treatment requirements, and ammonia

A detailed discussion of the County's objections to the Continued Tentative Order is provided in Attachment A.

In addition to our comments on the Continued Tentative Order, the County continues to object to a number of provisions and requirements of the May 2010 Tentative Order. For the convenience of the Board and your staff, a copy of the comments to the May 2010 Tentative Order has been annotated to indicate the status of each comment (Attachment B). To summarize, the County's other outstanding objections include:

- Inclusion of requirements prescribing the manner of treatment
- Inclusion of effluent limitations for copper, lead, and electrical conductivity
- Rejection of the request for capacity increase

It is the County's understanding that the Expansion Option included in the previous Tentative Order is still part of the Continued Tentative Order package that will be considered by the Regional Water Board, but was not included in the package that was circulated for the September 2010 Board hearing because the 30-day comment period for the option has closed.

11476 C Avenue Auburn CA 95603  
Entrance at 2855 2nd Street

Administration – Building Maintenance – Capital Improvements – Museums – Parks  
Property Management – Environmental Engineering – Utilities

Our comment package on the previous Tentative Order included a detailed summary of the County's progress toward facility improvements, inflow and infiltration controls and other compliance strategies from June 2005 through April 2010. Attachment C provides an update summarizing the County's efforts through July 2010. The activities completed from April 2010 through July 2010 are also detailed in the table below. This information demonstrates the County's continued diligence in pursuing compliance through both regionalization and facility and collection system improvements.

Activity	Amount Spent From April 2010 through July 2010	Tasks Completed
Regionalization	\$64,000	<ul style="list-style-type: none"> <li>• Issued an informal request for work plan and fee estimate, selected a consultant and executed a contract (\$170,000) to evaluate the assumptions used to develop the Regionalization Project cost estimate.</li> <li>• Drafted a formal request for proposals for pre-design of the Regionalization Project.</li> </ul>
Upgrade and Expansion	\$580,000	<ul style="list-style-type: none"> <li>• Executed \$8.2 million in contracts for design and environmental services.</li> <li>• Initiated design and environmental documentation.</li> </ul>
Collection System Investigations and Improvements	\$130,000	<ul style="list-style-type: none"> <li>• Pipe lining in the SMD 1 collection system.</li> </ul>
NPDES Permit Related Studies, Plans and Reports	\$130,000	<ul style="list-style-type: none"> <li>• Aluminum WER sample event</li> <li>• Infeasibility study</li> <li>• NPDES permit renewal effort</li> </ul>
Operations Improvements	\$10,000	<ul style="list-style-type: none"> <li>• Purchased and installed new anthracite filter media.</li> </ul>
<b>Subtotal (April – July 2010)</b>	<b>\$914,000</b>	

In consideration of the County's comments and the information provided in this submittal, the County requests the Regional Water Board take the following actions at the September Board hearing:

- Adopt the Continued Tentative Order revised per the County's comments in Attachment A and the applicable portions of the County's comments to the May 2010 Tentative Order
- Reject Alternatives 1 and 2
- Modify and adopt Alternative 3 as recommended in Attachment A

The County is also submitting a Supplemental Infeasibility Analysis regarding Alternative 4, the proposed chloroform and total trihalomethane effluent limitations (Attachment D). The remainder of our comments to Alternative 4 will be submitted separately, within the timeframe the Regional Water Board has provided for our review and comment of that alternative.

Thank you for your consideration of the information included in this submittal. We will contact you to schedule a follow-up meeting with you to discuss the enclosed comments prior to the adoption hearing. If you have any questions or concerns please contact David Atkinson of my staff at (530) 886-4968.

Sincerely,

 FOR  
Will Dickinson, Deputy Director

Attachments:

Attachment A - Placer County Comments on the July 2010 Tentative Waste Discharge Requirements and Cease and Desist Order for Placer County Department of Facility Services Placer County SMD 1 Wastewater Treatment Plant

Attachment B - Placer County Comments on the Tentative Waste Discharge Requirements and Cease and Desist Order for Placer County Department of Facility Services Placer County SMD 1 Wastewater Treatment Plant

Attachment C - Compliance Activities, Operations Changes, Collection System Improvements, Regionalization, and Upgrade and Expansion Plans for the Sewer Maintenance District 1 Wastewater Treatment Plant – June 2005 through July 2010

Attachment D – Supplemental Infeasibility Report for the Sewer Maintenance District 1 Wastewater Treatment Plant

cc: Webster J. Owen Jr., Owen Psomas  
Michael Bryan, Robertson-Bryan